

## March 2018 Oil & Gas Lease Sale Comment

DOI-BLM-UT-Y010-2017-0240-EA - Canyon Country District March 2018 Competitive Oil and Gas Lease Sale

It's not as though BLM doesn't have extensive experience with previously drilled and unsuccessful drilling in most of the areas being proposed for lease now. While the specific parcels may have not been previously, specifically leased/drilled, nearby locations have been drilled in recent memory, that even I remember. To now be rushing to lease parcels withing eye shot anew taxes credulity.

### Preamble:

Because the order to increase the pace of leasing BLM and Forest Service administered lands violates previous policy, The Agency must enter a separate NEPA process prior to execution of any increase in frequency of leasing.

To this end, the expedited leasing process must be halted to allow proper evaluation of the consequences of essentially flooding the market with leases that could result in lower resource extraction royalties to the U.S. Treasury.

BLM and every administrator, has a fiduciary responsibility to maximize all royalties and a hasty process threatens to short change the public interest.

The October 23, 2017 comment deadline must be extended until at least 30 days following completion of the NEPA process evaluating the consequences of increasing the pace of resource leasing.

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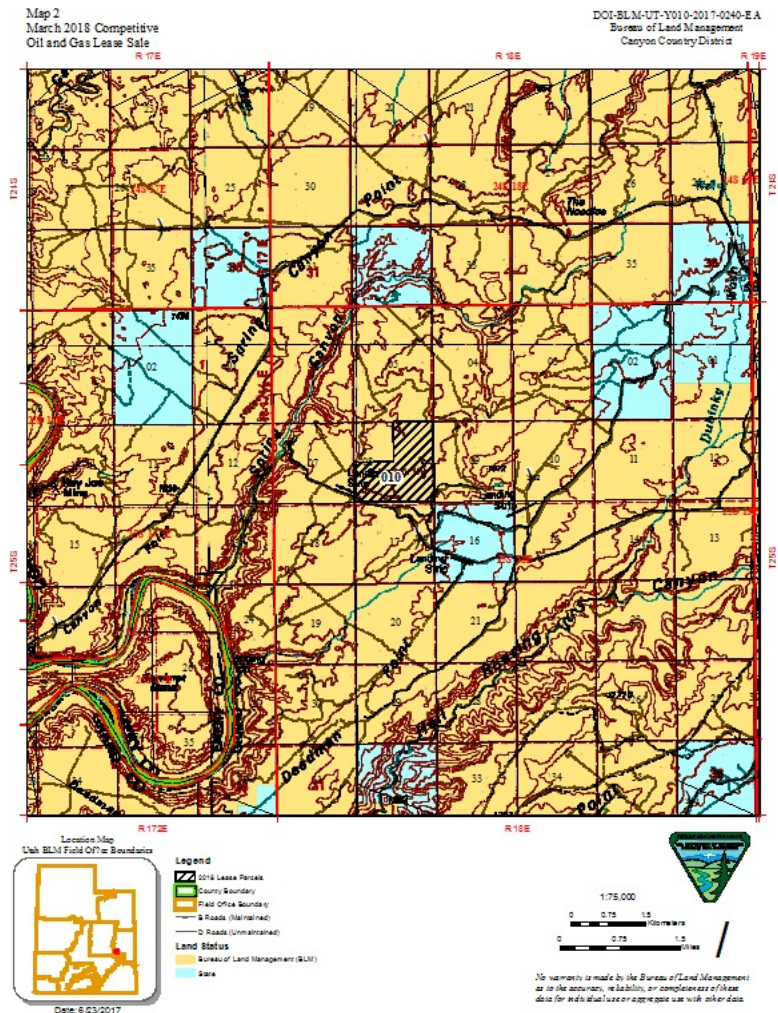
BLM's justification for proceeding with essentially leasing every available acre not yet leased represents a rush to judgement which is even acknowledged in the "Alternative" section which discounts out of hand consideration of any, that is any, possible alternative to rushing pell-mell into essentially removing multiple use of the public lands in this proposal to single use which if oil/gas drilling activities are allowed to proceed will render the land unsuitable for any other activity because of the resulting contamination of the area with approved or accidental deposition of drilling and production effluents containing various levels of dangerous substances.

"No other alternatives to the Proposed Action were identified that would meet the purpose and need of the Proposed Action."

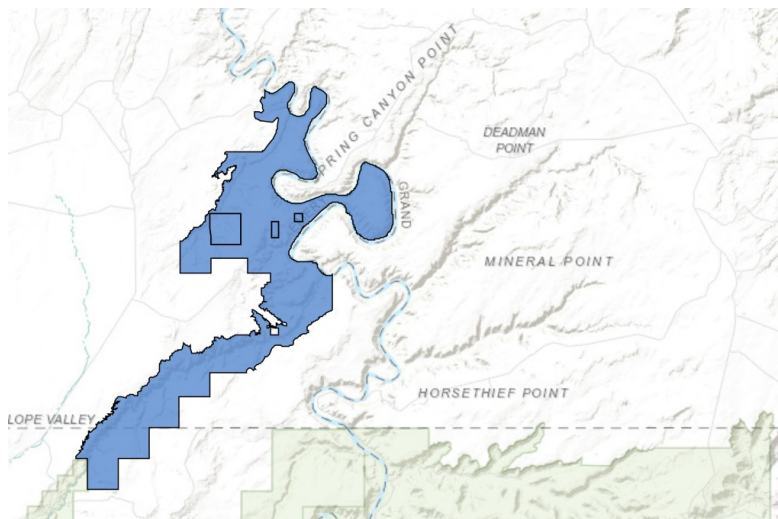
If this is The Agencies Environmental Assessment position, I demand a full Environmental Impact Statement process be opened and full scoping and proper evaluation of Every possible alternative be studied as requited in a NEPA-EIS process. Anything less represents a failure of The Agencies fiduciary responsibility.

Unsuccessful wells drilled in the vicinity in recent memory coupled with view shed and recreational values should have Deferred Parcel 10 from this proposed lease sale. Views from the upper west saddle of Bowknot Bend, as is frequently used by river runners on The Green as a spectacular vantage point for views of the "going and coming" aspects of the river around The Bend includes the east and northeast views of Labyrinth Canyon around The Bowknot as well as Spring Canyon and beyond across the rim where Parcel 10 is located.

The danger of inflow of accidental release of drilling fluids and/or petroleum effluent into the Spring Canyon drainage which could enter the Green River represents a potentially catastrophic risk to the four listed fish species. These include bonytail (*Gila elegans*), humpback chub (*Gila elegans*), Colorado pikeminnow (*Ptychocheilus lucius*), and razorback sucker (*Xyrauchen texanus*) are already on the brink as non-native and evasive fish species keep altering the river ecosystem. Anything that exacerbates the river ecosystem, such as increased in-flow of industrial pollutants, petroleum pollutants including benzene should disqualify Parcel 10 from the lease proposal. Parcel 10 must be Deferred.



Since the view shed from the high saddle areas of Bowknot Bend is within the North Horseshoe Canyon Wilderness Study Area, the recreational and wilderness values should carry as much weight as the view shed values that have Deferred the lease parcels along the north side of the San Juan River you have declared Deferred.



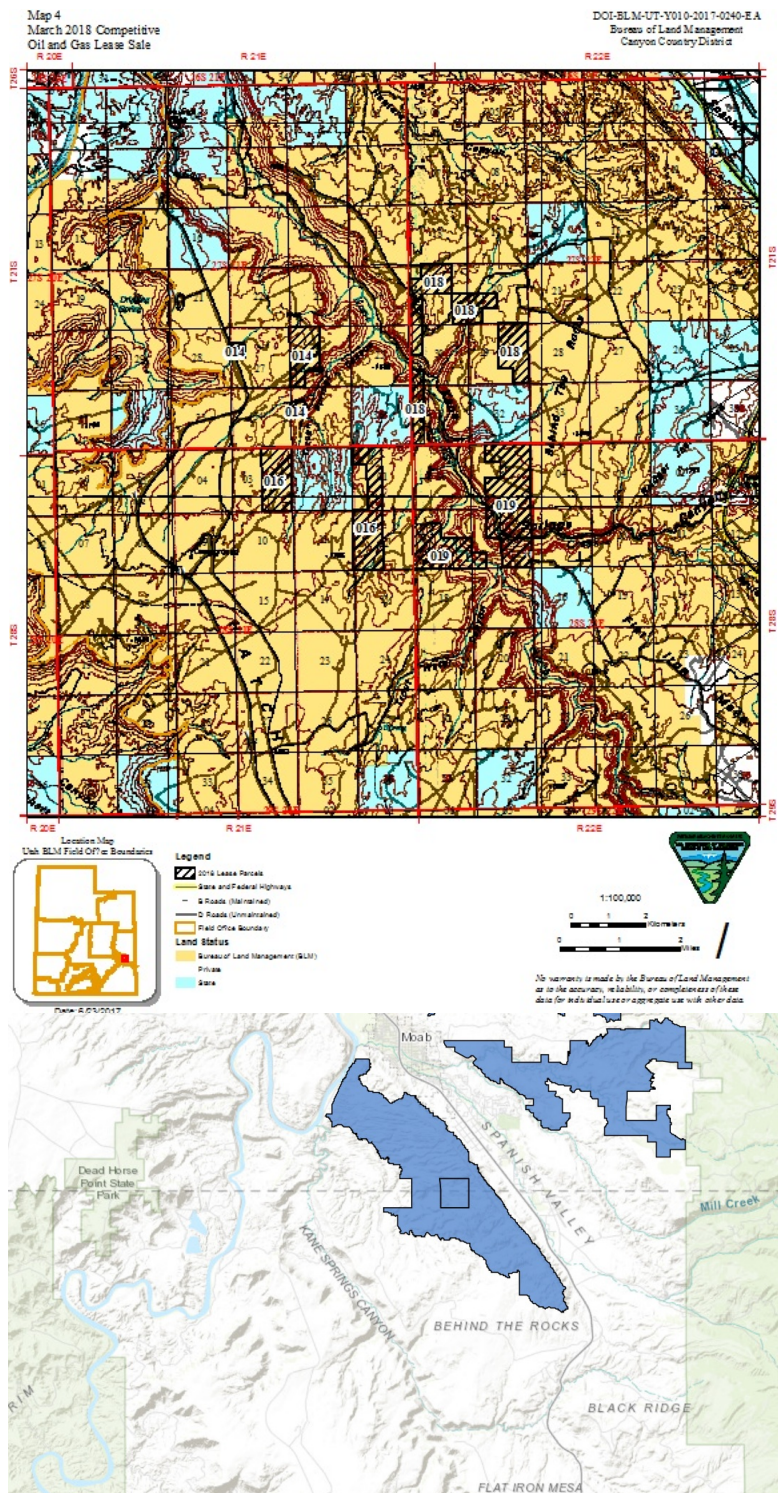


To now be rushing to lease parcels within the view shed of the Behind the Rock Wilderness Study Area and the singularly spectacular Trough Springs Canyon should be disqualifying factors for every parcel in this area.

In this case, Parcels 14, 18, and 19 should not even be in consideration for leasing with them straddling Trough Springs Canyon and tributaries. Hydro logic considerations alone should disqualify these fragmented parcels. When the recreational values associated with this spectacular canyon are added there should be no question these parcels are inappropriate to be included in the lease proposal and must be Deferred.

The view shed values are rich here and certainly as worth as any of the Deferred Parcels just north of the San Juan River that have been Deferred.

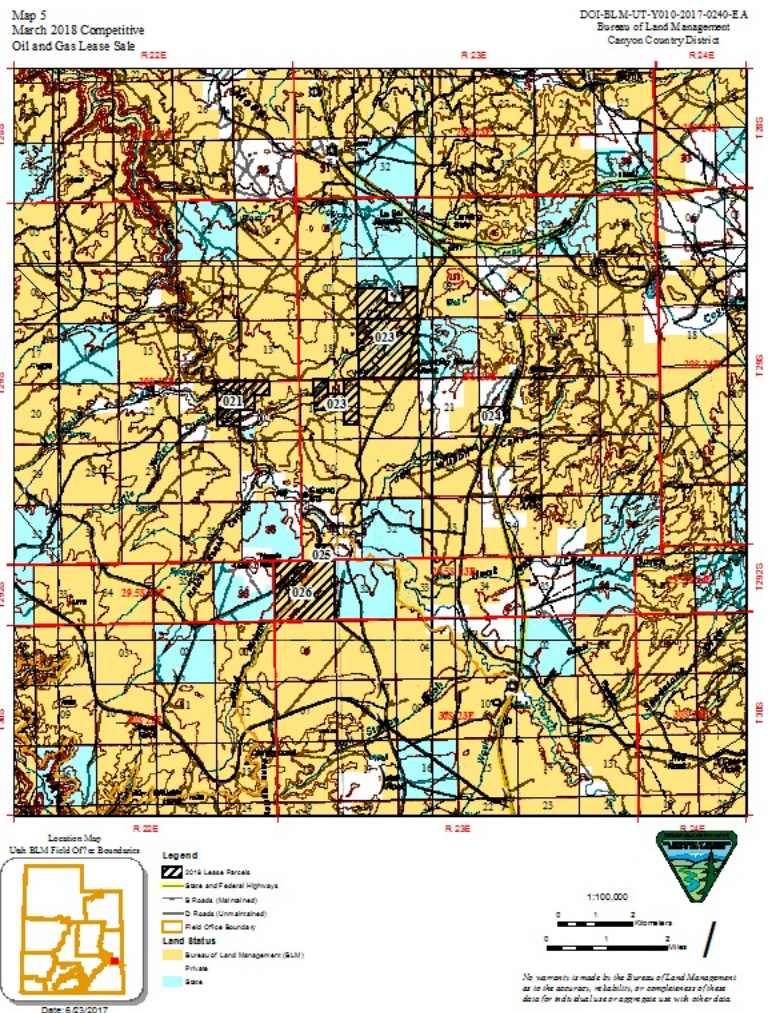
The apparent inconsistent evaluation of the proposed lease parcels seems to disqualify these areas from the lease proposal.



To now be rushing to lease parcels within the view shed of singularly spectacular sandstone canyons like Trough Springs Canyon, and Looking Glass Rock. In addition, being in the view shed of the popular Needles Overlook access road should disqualify all proposed lease parcels in this area.

In this case, Parcel 21 should not even be in consideration for leasing with it straddling Trough Springs Canyon. This selection as a leasable parcel is inappropriate on its face on Hydro logic basis along. It seems that Parcels 21, 22(23?), 23, 24, 25, and 26 have been contrived to in essence spoil otherwise natural, multiple use and spectacular recreation lands. The view shed values are rich here and certainly as worth as any of the Deferred Parcels just north of the San Juan River that have been Deferred .

The apparent inconsistent evaluation of the proposed lease parcels seems to disqualify these areas from the lease proposal.





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In this case, I remember a drilling rig working just south of Church Rock not so many years ago that came up dry. To now be proposing to lease Parcel 27 just up the valley north of the previously drilled site makes know sense. West of Lisbon Valley, there haven't been productive wells.

Beyond the already disproved potential of successful oil or gas wells in this area, the clear high recreational value in this scenic area that provides access to the Canyon Rims Recreation Area and the Needles District of Canyonlands National Park and Bears Ears National Monument should preclude consideration of leasing in this area. The view shed is of high value just as for the areas north of the San Juan River that were removed for lease consideration.

Map 6  
March 2018 Competitive  
Oil and Gas Lease Sale  
R 23E

DOI-BLM-UT-Y010-2017-0240-EA  
Bureau of Land Management  
Canyon Country District  
R 24E

